

3. All parties have agreed to consider the identified deficiencies and amend responses where appropriate by January 26, 2024. The parties are confident that they will be able to reduce their disagreements.
4. The Defendant City of Chicago has indicated they intend to file a Motion to Bifurcate *Monell* issues [by February 2, 2024]. Despite the City's intention to move for bifurcation, Plaintiff and Defendant City of Chicago had productive conversations about the scope of Plaintiff's *Monell* claims in the event bifurcation is denied.
5. The parties recognize that this Court's deadline was firm and the parties fully expected to comply with the Court's deadline but the January 11 and January 12 conferrals were very productive and the parties did not want to cut them short. The next available date for all parties to complete the conferral process was January 16. Based on the total progress made and the agreement to revisit the identified deficiencies and amend responses in accordance with the discussions the parties need additional time to finalize the remaining disputes.
6. Counsel for the Individual Officer Defendants requests the extension for the additional reason that they have encountered some difficulties consulting with their clients, all of whom are more than 70-years-old. Specifically, one of the Individual Officer Defendants lost his wife around Christmas, is staying with other family members, and while he has been as responsive as could be expected under those circumstances, counsel's access to him has been understandably restricted and his ability to now focus on the specifics of an investigation that occurred 38 years ago has been limited. Another of the Individual Officer Defendants has been recently hospitalized, first in intensive care and then in a rehabilitation section, with Covid. Another of the Individual Defendant Officers is 80-years-old, home-bound, is not computer savvy and sitting down to discuss paperwork, pleadings, or discovery responses for an extended time is difficult for him so the process of answering discovery for him must be done in stages.
7. As such, the parties are requesting a thirty-day extension of time to file the joint status report identifying written discovery disputes.
8. The parties appreciate this court's willingness to assist in discovery and will likely require the court's assistance on some matters, but the conferral process has resolved many disputes but the parties are still in the process of defining the discovery dispute that require court intervention. The parties have worked together cooperatively and expeditiously and expect to have their discovery disputes teed up within 30 days.
9. For the foregoing reasons, the parties jointly request until Monday February 19, 2024 to file a joint status report identifying written discovery disputes and until February 2, 2024 for the City to file their motion to bifurcate.

Respectfully Submitted,

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